CityofRedmond
WASHINGTON

May 1st, 2009

Ms. Harriet Beale
WA Department of Ecology
Water Quality Program
P.O. Box 47696
Olympia, WA 98504-7696

Subject: City of Redmond's Comments in Response to the Western Washington National Pollution Discharge Elimination System (NPDES) Phase II Municipal Stormwater Permit Modification Solicitation for Comments

Dear Ms. Beale,

This letter is in response to the solicitation for input to the ***Western Washington NPDES Phase II Municipal Stormwater Permit Modification,*** drafted March 18, 2009. The City of Redmond is in agreement with the permit modifications proposed by Washington State Department of Ecology in response to the Pollution Control Hearing Board's ruling. However, the City of Redmond would like to propose additional modifications to the NPDES Phase II Permit. The proposed modifications would result in efficiencies for permittees and cost savings for private stormwater system owners.

1. NPDES Phase II Permit Section S5.C.4.b.ii

Current Permit Language:

"Except as provided in S5.C.4.b.vii. below, inspect, prior to clearing and construction, all known development sites that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 Determining Construction Site Sediment Damage Potential."

Proposed Change:

Allow an alternative to the requirement of completing Appendix 7, Construction Site Sediment Damage Potential. The suggested alternative would be to allow permittees to inspect all sites in permit review, prior to clearing and grading. This alternative would circumvent the need to complete the Sediment Damage Potential Analysis to determine if a preconstruction site visit is warranted. Permittees would have to complete the Sediment Damage Potential Analysis if a project proponent requests an erosivity waiver.

The City of Redmond currently inspects all sites prior to clearing and grading, during the permit review process. The inspection is performed by construction inspectors qualified to evaluate sediment and erosion control needs. The inspection occurs prior to issuance of a clearing and

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grading permit. The outcome of completing the sediment damage potential analysis is negated in Redmond due to the standard inspection of all sites in review.

2. ***NPDES Phase II Permit Section S5.C.4.c.iii***

Current Permit Language:

"Annual inspections of all stormwater treatment and flow control facilities (other than catch basins) permitted by the Permittee according to S5.C.4.b. unless there are maintenance records to justify a different frequency. Reducing the inspection frequency shall be based on maintenance records of double the length of time of the proposed inspection frequency. In the absence of maintenance records, the Permittee may substitute written statements to document a specific less frequent inspection schedule.
Written statements shall be based on actual inspection and maintenance experience and shall be certified in accordance with G19 Certification and Signature."

Proposed Change:

Allow biannual inspection of private stormwater infrastructure if the permittee inspects all stormwater conveyance components during inspection, including pipes and catch basins. The permit should also provide incentive for permittees to inspect all private stormwater systems, regardless of the design standard.

Cleaning material from the conveyance system (catch basins, pipes) is cost effective compared to only cleaning material from treatment and flow control facilities. Cleaning material from the conveyance system, upstream of facilities, increases facility function and longevity. Cost saving for the private system owner is realized through preventative maintenance by reducing solids in the system upstream of flow and water quality facilities.

Although older flow and treatment facilities are undersized, the systems provide some treatment and flow attenuation which reduces impacts to receiving water bodies. Its important that such systems are inspected and managed to maximize their benefits, especially if the facilities are undersized due to design.

The City of Redmond has a long standing private system inspection program that inspects all sites, regardless of the treatment and/or flow control facility design standard. In addition, the City of Redmond inspects all stormwater infrastructure components (catch basins, treatment facility, pipes, etc) during site inspections. The increased scope of inspection allows for cost effective preventative maintenance, by removing solids prior to facilities, also increasing the functionality of older facilities. Inspecting all catch basins also allows for source control of pollutants. Adjusting the annual frequency to biannual frequency with the added scope of the inspection program would benefit private system owners and receiving water bodies. In addition, permittees committed to maintaining all private stormwater infrastructures should be allowed to due so at a different frequency than permittees that will only be inspecting water quality and treatment facilities designed to current standards.

3. NPDES Phase II Permit Section S5.C.5.d

Current Permit Language:

"...Inspections may be conducted on a "circuit basis" whereby a sampling of catch basins and inlets within each circuit is inspected to identify maintenance needs. Include in the sampling an inspection of the catch basin immediately upstream of any system outfall. Clean all catch basins within a given circuit at one time if the inspection sampling indicates cleaning is needed to comply with maintenance standards established under S5.C.4.c., above. As an alternative to inspecting catch basins on a "circuit basis," the Permittee may inspect all catch basins, and clean only catch basins where cleaning is needed to comply with maintenance standards."

Proposed Change:

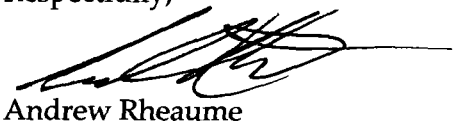
Allow for an alternative inspection process other than the "circuit basis." The proposed alternative would allow municipalities to perform inspection on an indicator structure basis. This would include selecting indicator structures, by GIS analysis of the conveyance system, to isolate sections ("branches") of the stormwater drainage system. If the indicator structure requires cleaning, the permittee will continue to verify maintenance needs for each catch basin upstream (within that branch) of the indicator structure. Cleaning equipment and staff would be able to maximize efficiency and the amount of material removed from the system by only cleaning structures that need cleaning and increasing inspection efficiency.

The circuit basis requires cleaning of catch basins regardless of cleanliness. Local jurisdictions that have piloted the circuit basis have concluded that it's more time consuming and results in cleaning more catch basins, some of which do not need cleaning, than inspecting each catch basin individually. The indicator method would allow for a quicker assessment of the drainage system to determine cleaning needs compared to inspecting every catch basin.

The City of Redmond would like to use the indicator structure method to inspect and assess cleaning needs of city owned catch basins, citywide. The indicator basis would allow for more efficient use of staff, equipment, and resources.

The City of Redmond has a long standing commitment to meet or exceed regional stormwater management standards and regulations. The modifications proposed would allow the City of Redmond to continue existing successful programs and implement new programs to efficiently and effectively meet the intent of the NPDES Phase II Municipal Stormwater Permit. Please feel free to contact me directly with any questions.

Respectfully,



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